

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

LOUISIANA CRANE ACQUISITION, LLC	CIVIL ACTION NO.
VERSUS	SECTION:
MATT ROLLMAN	JUDGE:
	MAGISTRATE:

**MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

May it Please the Court:

Louisiana Crane Acquisition, LLC (“Louisiana Crane”) requests the issuance of a Temporary Restraining Order (“TRO”) without notice, to be followed by a Preliminary Injunction, after due proceedings, against Defendant, Matt Rollman. Louisiana Crane moves for injunctive relief under Rule 65 of the Federal Rules of Civil Procedure to enforce Mr. Rollman’s contractual obligations under an employment agreement executed on November 8, 2019, between Louisiana Crane and Mr. Rollman (the “Employment Agreement”). As more fully explained in the accompanying Memorandum in Support, Verified Complaint for Temporary Restraining Order, Preliminary and Permanent Injunction, and Damages (“Verified Complaint”), and exhibits, which are incorporated by reference under Rule 10(c) of the Federal Rules of Civil Procedure, Louisiana Crane has satisfied the requirements for issuing a TRO and Preliminary Injunction and has demonstrated why a TRO should be issued without notice.

[Signature block on next page]

Respectfully,

s/Debra J. Fischman
DEBRA J. FISCHMAN (# 5578)
RYAN D. ADAMS (# 27931)
STUART D. KOTTEL (# 37194)
**SHER GARNER CAHILL RICHTER
KLEIN & HILBERT, L.L.C.**
909 Poydras Street, Twenty-eighth Floor
New Orleans, Louisiana 70112
Telephone: (504) 299-2100
Facsimile: (504) 299-2300
E-mail: dfischman@shergarner.com
E-mail: radams@shergarner.com
E-mail: skottle@shergarner.com

**ATTORNEYS FOR LOUISIANA CRANE
ACQUISITION CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been filed electronically in this Court's CM/ECF system on this 30th of September, 2022 and that it is being served on defendant's last known attorney, Mark R. Pharr, III at his e-mail address, tiger@gallowaylawfirm.com, and on the defendant at the following address:

Matt Rollman
508 Annaburg Drive
Youngsville, LA 70592

s/Debra J. Fischman
DEBRA J. FISCHMAN

RULE 65.1 CERTIFICATE

In accordance with Local Rule 65.1, I hereby certify that on September 30, 2022 copies of all pleadings and other papers filed in the action to date have been furnished to the adverse party's last known attorney by e-mail:

Mark R. "Tiger" Pharr
3861 Ambassador Caffery Pkwy, Suite 300
Lafayette, Louisiana 70503
tiger@gallowaylawfirm.com

s/Debra J. Fischman
DEBRA J. FISCHMAN